



Juice Products

ASSOCIATION

August 15, 2005

Mr. Arthur Neal
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National Organic Program
USDA-AMS-TMP-NOP
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RE: National Organic Program, Sunset Review
Docket Number TM-04-07

The Juice Products Association (JPA) is a trade association whose international membership consists of major packers and distributors of a wide variety of fruit and vegetable juices, juice beverages, drinks, jams, jellies, fruit spread and other fruit products. Our members represent a significant majority of the juice and juice beverage processors in the United States. JPA submits the following comments on the advance notice of proposed rulemaking published in the June 17, 2005 *Federal Register* (70 FR 35177) related to the National Organic Program Sunset Review. In the notice, the United States Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) is requesting comments on certain synthetic and non-synthetic substances on the National List of Allowed and Prohibited Substances for organic agricultural production and handling.

There are number of synthetic and non-synthetic substances included on the National List that are used in the production of juices, juice beverages and juice products. JPA supports the continued use of the synthetic and non-synthetic substances allowed for use in organic production and handling (§205.601, "synthetic substances allowed for use in organic crop production; §205.605, "nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))" and §205.606, "nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))." These substances should continue to be allowed in the production of organic products as manufacturers have incorporated these ingredients into their current formulas or processes. If these substances are prohibited, current manufacturing processes and formulas

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would need to be revised to accommodate alternative ingredients, which would have a significant economic impact on the food industry. In turn, this would result in higher costs for the consumer without providing added value. In addition, the current list of substances has been used for years in or on organic products that consumers have grown to love.

Specifically, JPA is requesting that the following substances in §205.605(a) and (b), continue to be allowed in the manufacture of organic products:

- (a) Non-synthetic substances allowed: acids (citric), bentonite, calcium carbonate, diatomaceous earth, enzymes, flavors, kaolin, nitrogen, perlite and tartaric acid.
- (b) Synthetics substances allowed: alginates, ascorbic acid, calcium hydroxide, carbon dioxide, low-methoxy pectin, potassium tartrate made from tartaric acid, tartaric acid and xanthan gum.

In addition, JPA is requesting that gums (arabic, guar, locust bean, carob bean) and high-methoxy pectin, which are listed in §205.606, continue to be allowed in the production of organic products.

The 28th Session of the Codex Alimentarius Commission recently adopted the Codex General Standard for Fruit Juices and Nectars, which serves as a guide for the production of fruit juices and nectars worldwide. The 36th Session of the Codex Committee on Food Additives and Contaminants endorsed the food additive provisions in the fruit juices and nectars standard. A number of these food additives are included on the National List and include the following: citric acid, ascorbic acid, carbon dioxide, pectins, bentonite, calcium hydroxide, diatomaceous earth, kaolin, perlite, potassium tartrate, calcium carbonate, enzyme preparations, nitrogen and carbon dioxide.

We appreciate your consideration of these comments.

Sincerely,



Patricia Faison
Technical Manager